

EXHIBIT C

Sean P. Trende
September 02, 2022

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

- - -

League of United Latin :
American Citizens, et al., :
:
Plaintiffs, :
:
vs. : Case No.
: 3:21-CV-00259
Greg Abbott, et al., :
:
Defendants. :
:
- - -

DEPOSITION OF SEAN P. TRENDE

- - -

Friday, September 2, 2022
9:00 a.m.
Squire Patton Boggs
41 South High Street
Suite 2000
Columbus, Ohio 43215-6101

- - -

SUSAN L. COOTS, RPR
REGISTERED PROFESSIONAL REPORTER

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And, thereupon, Plaintiff's Exhibit No. 10

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BY MS. ANDERSON:

5

Q. Mr. Trende, the court reporter has handed
you what has been marked as Exhibit 10. Mr. Trende,
what is the document that she just handed you?

6

A. This is three tweets.

7

Q. And when is it dated, the first one?

8

A. December 14th, 2020.

9

Q. And who drafted the tweet?

10

A. I wrote the tweet.

11

Q. And do you have any reason to believe that
this is -- to disagree with the fact that this is a
true and correct copy of your tweet?

12

A. No, I don't have any reason to disagree.

13

Q. And, Mr. Trende, does your tweet say, "Been
playing around with Texas maps, and it's pretty easy
to draw three new R districts, draw two minority
opportunity districts by making 7 and 32
minority-majority; make 23 majority-Trump, while
keeping around 66 percent Hispanic and make Texas 28
heavily Trump while keeping around 66 percent
Hispanic."

1 A. That's what it says, yes.
2 Q. And, Mr. Trende, what data did you use to
3 draw the Constitutional districts that you discuss in
4 this tweet?

5 A. Data's Redistricting App.

6 Q. What data did you use in Data's
7 Redistricting App?

8 A. Whatever Data's Redistricting Map makes
9 available.

10 Q. Did you use racial data in drawing these
11 Congressional districts referenced in your tweet?

12 A. I don't know. There's a subsection of
13 Twitter called "Election Twitter" that likes to draw
14 maps and map out scenarios. I think I drew a map in
15 Illinois that was, like, 16-1 Democratic, and one in
16 Ohio that was 13 or 13-2 by taking every precinct
17 along I-71 and linking them together. So I don't know
18 what I was doing. This was for my own entertainment.
19 I know it's hard to believe for someone not in my line
20 of work how that could be entertaining, but...

21 Q. And then, Mr. Trende, what do you mean by
22 your statement that "It's pretty easy" for you to draw
23 two new minority-majority Congressional districts in
24 Texas?

25 A. That it wasn't difficult to make 7 and 32

1 minority-majority, which I don't think they were in
2 the previous iteration.

3 Q. And, Mr. Trende, did you draw any other
4 minority opportunity districts in Texas?

5 A. I don't think so. Again, this is something
6 that was done entirely for my own entertainment, so I
7 don't remember the specifics of it.

8 Q. So you drew a new minority-majority
9 Congressional district in Harris County, correct?

10 A. I turned 7 into one.

11 Q. And what were the boundaries of 7 that you
12 drew?

13 A. I have no clue.

14 Q. Do you recall what it looked like?

15 A. Not even a little bit. I don't even
16 remember really doing this until you reminded me.

17 Q. And what was the racial composition of the
18 new minority-majority Congressional district in Harris
19 County?

20 A. I have no clue. I did it for my own
21 entertainment.

22 Q. Did you create -- Was the Hispanic CVAP over
23 50 percent in that district?

24 A. I honestly have no idea.

25 Q. And, Mr. Trende, you drew a new

1 minority-majority Congressional district in the DFW
2 area, correct?

3 A. It appears I turned 32 into a
4 minority-majority district. That should probably --
5 Yeah, that's 32. That's Olson's office.

6 Q. And what did that district look like?

7 A. I don't know.

8 Q. Do you recall what the boundaries were?

9 A. No.

10 Q. What was the racial composition of the DFW
11 Congressional area district that was the new
12 minority-majority district?

13 A. I have no idea.

14 Q. Did you look at racial data in drawing the
15 DFW district?

16 A. I would guess that, since I said it was
17 minority-majority, I would have checked the minority
18 population of it.

19 Q. Is it also true for the new minority
20 opportunity district that you drew in Harris County?

21 A. Since I said it was minority-majority, then
22 I would have at least looked at the output of the
23 district to see where it landed.

24 MS. ANDERSON: Could we have a two-minute
25 break.

1 read that correctly?

2 A. I think that's the second-to-last sentence.

3 But yes.

4 Q. You're absolutely right. Thank you.

5 And so my question for you -- Well, let's go
6 to Page 7 because there's something very similar on
7 Page 7, if you wouldn't mind. The second bullet in
8 the Summary of Opinions, did you write there, "The
9 Plaintiffs' alternative maps typically function only
10 by stitching together non-compact minority populations
11 from disparate areas of the region"; is that correct?

12 A. Yes.

13 Q. Okay. Thank you.

14 Did you evaluate the LULAC plaintiffs'
15 alternative maps?

16 A. I did examine those maps, yes.

17 Q. You examined them. Did you provide any
18 discussion in your report of the LULAC plaintiffs'
19 alternative maps?

20 A. No. Not directly.

21 Q. Okay. Then tell me what you did do. If it
22 wasn't direct, if it was indirect or otherwise.

23 A. Well, the dotplots that are provided of the
24 racial composition of the areas can be used to
25 evaluate the Morales or to illustrate the Morales

Sean P. Trende
September 02, 2022

1 State of Ohio :
2 SS:
County of Franklin:

3 I, SEAN P. TRENDE, do hereby certify that I
4 have read the foregoing transcript of my deposition
5 given on September 2, 2022; that together with the
6 correction page attached hereto noting changes in form
7 or substance, if any, it is true and correct.

8 _____
9 SEAN P. TRENDE

10 I do hereby certify that the foregoing
11 transcript of the deposition of SEAN P. TRENDE was
12 submitted to the witness for reading and signing; that
13 after he had stated to the undersigned Notary Public
14 that he had read and examined his deposition, he
15 signed the same in my presence on the _____ day of
16 _____, _____.

17 _____
18 Notary Public

19 My commission expires _____

20 - - -
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Sean P. Trende
September 02, 2022

1 CERTIFICATE

2 State of Ohio :
3 County of Franklin:

4 I, Susan L. Coots, Notary Public in and for
5 the State of Ohio, duly commissioned and qualified,
6 certify that the within named SEAN P. TRENDE was by me
7 duly sworn to testify to the whole truth in the cause
8 aforesaid; that the testimony was taken down by me in
9 stenotypy in the presence of said witness, afterwards
10 transcribed upon a computer; that the foregoing is a
11 true and correct transcript of the testimony given by
12 said witness taken at the time and place in the
13 foregoing caption specified.

14 I certify that I am not a relative,
15 employee, or attorney of any of the parties hereto, or
16 of any attorney or counsel employed by the parties, or
17 financially interested in the action.

18 IN WITNESS WHEREOF, I have set my hand and
19 affixed my seal of office at Columbus, Ohio, on this
20 16th day of September, 2022.

21 

22 SUSAN L. COOTS, Notary Public
23 in and for the State of Ohio and
24 Registered Professional Reporter.

25 My Commission Expires January 10, 2025.